

**Crest Nicholson Strategic Land & Planning and
Bellway Homes Limited (Southern Counties)**

Hearing Statement

Matter 6c: Strategic Policy HA4: Land East of Billingshurst

Date of report: September 2026

Representor Number: 1194442

PREPARED FOR



savills

Contents

1. Introduction.....2

2. Transport and Movement.....3

3. Design, Layout and Facilities 5

4. Impacts and Mitigation.....6

5. Delivery.....7

6. Conclusion.....9

Appendix A Joint Position Statement 10

Contact 11

Document History

Issue	Date	Issued by	Comment
1.0	18/09/2026	HK	Draft
2.0	25/09/2026	HK	Final



1. Introduction

- 1.1 This Statement has been prepared by Savills, on behalf of Bellway Homes Limited (Southern Counties (herein referred to as 'Bellway') and Crest Nicholson Strategic Land & Planning (herein referred to as 'Crest'), in response to **Matter 6c concerning Strategic Policy HA4: Land East of Billingshurst** ('the Site'). It draws upon the evidence submitted throughout the Local Plan process, including the Regulation 19 representations, supporting technical evidence, previous Hearing Statements and responses to the Main Modifications consultation.
- 1.2 Bellway and Crest strongly support the principle of Strategic Policy HA4 and consider the allocation to be a sustainable, deliverable and effective component of the Local Plan strategy. Land East of Billingshurst represents a logical urban extension to Billingshurst, a settlement identified by Horsham District Council (HDC) as a Second Tier Settlement with an important role in accommodating future growth. The Site is immediately adjacent to the existing settlement, lies approximately 200m from Billingshurst Railway Station, benefits from existing and proposed sustainable transport connections and is capable of delivering significant housing, community and infrastructure benefits. Indeed, a large component of the Site, for development management purposes – would accord with National Planning Policy Framework (NPPF) (2026) policy S5 (h) – being so close to a mainline station.
- 1.3 The indicative masterplanning (submitted with previous promotion material) undertaken by Bellway and Crest demonstrates the capacity to deliver approximately 700 dwellings north of the railway line, together with a new primary school site, community hub, employment opportunities, extensive public open space, ecological enhancements and sustainable transport improvements. The Main Modifications now expand the allocation to include land south of the railway and increase overall capacity to at least 1,000 dwellings. Bellway and Crest remain committed to delivering the northern parcel independently if necessary - whilst working collaboratively on strategic infrastructure requirements with Richborough (who control the land south of the railway).
- 1.4 Further details on this matter are set out in the Position Statement between the three parties at **Appendix A** of this Statement.

2. Transport and Movement

Highway Access Arrangements

- 2.1 The evidence demonstrates that Land East of Billingshurst is capable of being accessed safely and efficiently. Existing opportunities for connection already exist from Brookers Road, the A272/Coneyhurst Road corridor and the adjoining Amblehurst Green development. The allocation is therefore uniquely positioned to provide multiple access points and a permeable movement network that integrates with the existing settlement. Richborough will provide separate information within their Hearing Statement in relation to the access arrangements for the southern parcel. Land north and south of the railway do not depend on a singular vehicular access, there are different highways access opportunities.
- 2.2 As set out in the Vision Document which supported Bellway and Crest's Regulation 19 Representations (March 2024), the principal street has been designed to function as a future bus route and that the movement framework has evolved through extensive engagement with HDC and West Sussex County Council (WSCC). The design process has specifically considered pedestrian, cycle and vehicular access arrangements alongside educational requirements and place-making objectives. All in all, the Site is very well positioned to the village centre – and Weald Secondary School – along with the station.

Rail Footbridge

- 2.3 Bellway and Crest support the principle of safeguarding land adjacent to the existing railway crossing to accommodate a future grade-separated crossing if required. This is a proportionate and future-proofed approach which recognises both safety considerations and the need for accessibility improvements over time.
- 2.4 Critically, however, neither the evidence nor the wording of Strategic Policy HA4 requires delivery of a footbridge or underpass prior to commencement of development. Our Main Modifications response notes that the Infrastructure Delivery Plan (IDP) incorrectly suggests delivery before commencement and confirms that this is not aligned with the policy wording (as given by MM226 – which Network Rail considers to be sound). Delivery of the bridge prior to commencement would render the allocation unsound – as it would negatively impede the delivery of homes / other infrastructure.
- 2.5 Bellway and Crest therefore consider the sound approach to be:
1. Safeguarding land from the outset (and dedicating it to Network Rail when it is required);
 2. Agreeing an appropriate phasing programme through the planning application process. Bellway and Crest are in agreement with Richborough that the trigger for the transfer of safeguarded land should be the implementation of the new primary school in the northern parcel;
 3. Network Rail to be responsible for delivering the footbridge supported by fair and reasonable financial contributions from both the northern and southern parcels of the site allocation.

Integration of Sustainable Transport

- 2.6 The Site is considered to be the most sustainable greenfield allocation in the emerging Local Plan given that it is adjacent to Billingshurst Railway Station, which provides regular direct services to London Victoria, Horsham, Crawley, Pulborough and the wider rail network.
- 2.7 The previously submitted Vision Document and masterplan for the northern parcel of the site allocation show that pedestrian and cycle connectivity between the Site, station, village centre,

schools, local facilities, open space and employment opportunities has been maximised. Existing rights of way are integrated into the movement framework and new walking and cycling routes are proposed throughout the development. Whilst it is likely that the PRow that presently runs across the railway line will require a slight diversion to accommodate the footbridge, it is not considered that this diversion will have significant implications on pedestrian desire lines.

3. Design, Layout and Facilities

Integration with Billingshurst

- 3.1 The site allocation is exceptionally well integrated with the existing urban form. The western boundary directly adjoins existing residential areas including Broomfield Drive and Brookers Road, whilst Amblehurst Green forms a contemporary urban edge to the north. Rather than creating a detached settlement, the masterplan for the northern parcel of the site allocation seeks to continue and reinforce existing movement patterns and social connections.
- 3.2 **Bellway and Crest maintain support for the Vision Document/ Masterplan submitted with the Regulation 19 representations. This may still be realised – with the expanded allocation area of HA4 south of the railway – as a principal Master Phase.**

Provision of Social and Community Infrastructure

- 3.3 Community infrastructure is a major strength of the allocation and the final uses for the community hub will be confirmed through the planning application process, following engagement with the relevant local stakeholders.
- 3.4 The northern parcel of the allocation will also deliver serviced land for a new primary school which will then be taken on by the WSCC Education team to deliver, partially using fair and reasonable financial contributions from the northern and southern parcels of the site allocation. In line with the response received from WSCC Education on Main Modification ref: MM226, Bellway and Crest support the wording for criterion 2d)i) to be reverted to state a 1FE primary school expandable to 2FE.
- 3.5 **This change, if made, on the basis that the emerging allocation has always included a primary school – is not considered to be a Main Modification.**

C2 Accommodation

- 3.6 In respect of C2 provision, Bellway and Crest question the need for C2 provision to be allocated as part of Strategic Policy HA4. There is no explicitly stated quantum or even a range for provision of older persons homes, and therefore, no way of determining whether such a specific need is required to be delivered as part of the HA4 allocation. **Whilst there is presently no intention for Bellway and Crest to propose C2 on the northern parcel, it is understood that this is a possibility on part of the land controlled by Richborough to the south of railway.**

4. Impacts and Mitigation

Landscape and Countryside

- 4.1 Although the Site is currently agricultural land, it is not subject to the highest landscape designations and is strongly contained by existing urban development, the A272 and the railway corridor. Thus, impacts arising will be localised. HDC's landscape evidence base is already very extensive and as re-iterated throughout previous promotion work, the masterplan will be landscape-led with sufficient open space, existing and new planting proposed throughout.

Wildlife and Biodiversity

- 4.2 As set out in the Main Modifications response, Bellway and Crest **continue to object to the policy requirement for the protection and enhancement of the Wilden's Meadow Local Wildlife Site (LWS)**, alongside the inclusion of this land within the boundary of the emerging Site Allocation. The inclusion of Wilden's Meadow within the boundary is not justified. The policy itself requires the Local Wildlife Site to be conserved and enhanced and does not envisage built development within this area.
- 4.3 The previously submitted Vision Document demonstrates how green corridors connect habitats throughout the Site while strengthening ecological connectivity. Existing trees, woodlands, hedgerows and wetland features will be retained and enhanced wherever possible.
- 4.4 **Whilst a change to the allocation would be supported – overall – on the basis that phased planning application(s) will come forward within the allocation, which is permitted by policy HA4 – there is likely to be no consequence arising from the proposed allocation area – noting that it is unlikely that any planning application would come forward comprising this land.**

Heritage Assets

- 4.5 The principal heritage considerations comprise the Grade II listed Little Daux Farmhouse and Grade II listed Rosier Farmhouse. The masterplan has evolved specifically in response to these assets. Distinct character areas have been developed, and layout modifications have been introduced to preserve setting and significance.
- 4.6 Strategic Policy HA4 appropriately requires development to recognise and respect these heritage assets. The evidence demonstrates that this can be achieved through sensitive design, landscaping and spatial separation.

Climate Change, Drainage, Flood Risk and Utilities

- 4.7 The Site lies predominantly within Flood Zone 1 and is considered to be at low risk from fluvial and surface water flooding. As set out in HDC's Sequential and Exception Flood Risk Tests (June 2026), the northern parcel of the site allocation has a flood risk score of 7 (with '1' being, in technical terms, the most at-risk of flooding from one or more sources, and '7' being least at-risk of flooding).
- 4.8 Utility providers are already planning infrastructure investment within Billingshurst and there is no evidence that utilities present an overriding constraint to delivery. Please refer to Appendix 4 of the Regulation 19 Representations for further information in respect of utility considerations for the northern parcel of the site allocation.

5. Delivery

Masterplanning

- 5.1 In respect of the land north of the railway, considerable masterplanning work has already been undertaken. The Vision Document / Masterplan and supporting masterplans demonstrate a coherent, landscape-led framework that has evolved through extensive engagement with HDC, WSCC and the local community.
- 5.2 Bellway and Crest support comprehensive masterplanning but consider that flexibility should remain at the application stage to allow detailed design evolution. As set out in the Position Statement with Richborough (**Appendix A**), a co-ordinated approach to the overarching masterplanning will be undertaken as the planning application(s) progress.
- 5.3 Bellway and Crest's interpretation of Strategic Policy HA4 Criterion 2 is that through the proposed joint working (as outlined in **Appendix A**) it will be possible for separate Masterplans, design codes, phasing plans etc. to come forward and that the test is that these are co-ordinated to create the overarching comprehensive framework.
- 5.4 Bellway and Crest have consistently demonstrated a strong commitment to early delivery. The most recent programme anticipates delivery commencing in 2028/29, with build rates increasing thereafter and delivering 650 dwellings across the northern parcel by 2032/33. Annual output is projected to reach up to 175 dwellings per annum. See also **Appendix A** to this Hearing Statement.
- 5.5 Bellway and Crest have consistently accepted the need to fund appropriate infrastructure through a combination of on-site delivery, Section 106 obligations and Community Infrastructure Levy contributions. Infrastructure delivery is discussed in detail in Appendix B of the previously submitted Matter 9 Examination Statement (November 2024). Following the inclusion of the land to the south within the Site Allocation as part of the Main Modifications, **Appendix A** of this Statement sets out the position with Richborough in respect of joint delivery of infrastructure.
- 5.6 Importantly, viability evidence prepared for the Examination confirms that the northern parcel remains a viable development proposition when a fair and reasonable infrastructure package is applied.

Potential Delivery Impediments

- 5.7 No insurmountable delivery impediments have been identified. The principal technical considerations requiring ongoing management are:
- Railway crossing enhancements and delivery triggers;
 - Agreement of transport mitigation packages;
 - Education infrastructure requirements;
 - Detailed ecology and biodiversity implementation;
 - Finalisation of Section 106 obligations.
- 5.8 These are normal development management matters rather than barriers to allocation. The evidence demonstrates that they can be addressed through planning conditions, legal agreements and collaborative working with statutory stakeholders.
- 5.9 As explained further in **Appendix A** Bellway, Crest and Richborough are committed to working collaboratively with each other, HDC, WSCC, Network Rail, infrastructure providers and other

relevant stakeholders to deliver a sustainable and comprehensively planned urban extension to Billingshurst within the plan period.

6. Conclusion

- 6.1 Strategic Policy HA4 is a sound and deliverable strategic allocation which has been positively prepared, is justified, effective and consistent with national policy. Land East of Billingshurst represents one of the most sustainable urban extensions available within Horsham District, benefiting from immediate proximity to the settlement boundary, railway station, existing services and employment opportunities.
- 6.2 The northern parcel of the site allocation is capable of delivering substantial benefits including approximately 700 dwellings, 35% affordable housing, a primary school site, community hub, employment opportunities, extensive public open space, biodiversity enhancements and sustainable transport infrastructure.
- 6.3 The evidence demonstrates that transport, landscape, ecology, heritage, flood risk and infrastructure considerations can all be appropriately addressed through the proposed masterplanning framework and future planning applications. The Site is available, achievable and deliverable within the plan period.
- 6.4 Bellway and Crest therefore support the continued allocation of Land East of Billingshurst and consider that Strategic Policy HA4 must be retained as a key component of the Local Plan's strategy for meeting housing and infrastructure needs in a sustainable manner. **However, as set out in this Statement, changes to the policy wording for the primary school and C2 provision are requested alongside the policy protection of the Wilden's Meadow Local Wildlife Site (LWS). In the context of the wider Local Plan, these are considered fairly minor changes, though noting in interpretation, the policy as worded can be interpreted flexibly.**
- 6.5 Bellway and Crest's interpretation of Strategic Policy HA4 Criterion 2 is that through the proposed joint working (as outlined in **Appendix A**) it will be possible for separate Masterplans, design codes, phasing plans etc. to come forward, and that the test is that these are co-ordinated to create the overarching comprehensive framework.

Appendix A Joint Position Statement

Joint Position Statement

Land East of Billingshurst (Strategic Policy HA4)

Crest Nicholson, Bellway Homes and Richborough

FINAL

25th September 2026

Purpose

This statement has been prepared jointly by Crest Nicholson, Bellway Homes and Richborough ("the Parties"), the promoters of the land comprising the Land East of Billingshurst strategic allocation (Strategic Policy HA4).

The purpose of the statement is to confirm the Parties' shared commitment to the comprehensive and coordinated delivery of the allocation and to provide assurance to Horsham District Council and the Local Plan Inspector that the allocation is capable of being delivered in a timely and effective manner.

Shared Commitment

The Parties are committed to working collaboratively with each other, Horsham District Council, West Sussex County Council, Network Rail, infrastructure providers and other relevant stakeholders to deliver a sustainable and comprehensively planned urban extension to Billingshurst.

The Parties recognise that successful delivery of the allocation requires coordination across the land north and south of the railway and are committed to maintaining a collaborative approach to infrastructure planning, masterplanning and delivery.

The Parties will agree shared joint-working arrangements – to facilitate cooperation, where necessary, including sharing of relevant technical information and studies – in order to advance planning application(s) within the Policy HA4 area.

Strategic Infrastructure

The Parties acknowledge the importance of delivering the infrastructure necessary to support the allocation, including:-

- A new primary school (1FE expandable to 2FE where justified);
- A safe and accessible pedestrian and cycle connection across the railway, potentially including a new bridge (assisting with Network Rail's objectives to close at-grade railway crossings);
- Highway and transport improvements;
- Utilities and energy infrastructure, including any network reinforcement requirements appropriate for an urban extension (rather than a standalone new settlement);
- Community facilities;
- Green infrastructure and public open space; and
- Gypsy and Traveller accommodation in accordance with Policy HA4.
- **C2 older persons' housing**, where a need is demonstrated and the provision is justified, recognising that the delivery of Policy HA4 will be funded predominantly, if not entirely, by the value generated by the C3 housing.

The Parties recognise that some elements will require engagement with statutory bodies and third-party organisations. However, based on work undertaken to date, the Parties are not aware of any infrastructure constraints that would prevent delivery of the allocation.

Coordination and Delivery

The allocation is in separate landownerships and may appropriately come forward through at least two separate planning application(s) reflecting the land interests north and south of the railway.

The Parties consider that separate planning application(s) are fully compatible with the comprehensive development of Policy HA4, provided that development is brought forward within a coordinated framework and under the joint-working arrangements.

Accordingly, the Parties are committed to:

- Coordinated masterplanning;
- Joint consideration of infrastructure requirements, triggers and delivery mechanisms (achieved through the preparation of an Infrastructure Schedule);
- A consistent approach to technical evidence and assessment work where appropriate;
- Coordinated infrastructure phasing; and
- Ongoing engagement with the Council and other stakeholders.

The Parties also recognise the importance of establishing a coordinated strategy for a future railway crossing and will continue to engage with Network Rail, West Sussex County Council and Horsham District Council regarding the identification, design, planning strategy, delivery and funding of an appropriate solution. The land, and appropriate designs may be progressed, on the understanding that the key delivery partner is Network Rail.

The approach advocated to enable any footbridge crossing is:

- Any footbridge, including pedestrian/ connectivity to it – factored on the parameter plans/ Masterplan for approval;
- An evidenced justification for the timing / trigger for any footbridge;
- This may possibly be when the 1FE (expandable to 2FE) primary school is practically complete and open;
- Ahead of this, at an agreed point early in the build, the agreed transfer of dedicated land to Network Rail – to safeguard the land necessary to construct any footbridge;
- This land may become part of railway operational land – terms within the agreed transfer;
- A scheme for the funding of the necessary planning application (under the TCPA 1990) or Transport and Works Act Order (under the Transport and Works Act 1992) will be agreed early in the build – to be advanced by Network Rail;
- The scheme to include any process required (in liaison with West Sussex CC) for any minor diversion to the existing public right of way (to the landings – or to include over the new footbridge);
- Fair and reasonable funding for the design and construction of any footbridge – which will be delivered by Network Rail (as part of an approved programme/ business case – justified by funding, safety and operational reasons).

This process will be further discussed with HDC, WSCC and Network Rail, as part of pre-application on the future planning application(s) – with the necessary obligations / contributions agreed as part of the S106 legal agreement(s). Network Rail's response to the Main Modifications is supportive of any future closure of the present at-grade level crossing.

Technical Evidence

Whilst planning application(s) may be prepared separately, through the joint-working arrangements, the Parties intend to coordinate the preparation and review of strategic evidence where appropriate, including:-

- Transport and movement assessments (including sharing / updating of main access designs on the A272 – which is currently underway);
- Environmental and ecological assessments;
- Coordinated approach to EIA scoping – as a Project – north and south of the railway;

- Flood risk and drainage strategies;
- Utilities and infrastructure assessments (noting approach to energy upgrades – suitable for the scale of development);
- Education provision and school planning; and
- Infrastructure delivery and phasing programmes.

This approach will help ensure that the allocation is planned and delivered as a single strategic development notwithstanding separate planning application(s).

Deliverability and Conclusion

The Parties consider that Strategic Policy HA4 is a deliverable and achievable allocation capable of making a significant contribution towards Horsham District's housing and infrastructure requirements during the plan period.

The Parties are committed to:

- The comprehensive delivery of Policy HA4;
- Collaborative working between the land interests north and south of the railway;
- The coordinated planning, funding and phasing of strategic infrastructure;
- Continued engagement with Horsham District Council and other stakeholders; and
- Ensuring that infrastructure requirements support, rather than unnecessarily delay, delivery.
- The below table sets out Crest, Bellway and Richborough's housing trajectories on the basis that the Local Plan will be adopted in early 2027 and the planning application(s) will follow thereafter.

Year	Crest Land Delivery	Bellway Land Delivery	Richborough Land	Total
2028/29		25		25
2029/30	75	75	25	175
2030/31	75	75	150	300
2031/32	100	75	150	325
2032/33	75	75	25	175
				1,000

The Parties will continue to work together to demonstrate the soundness, deliverability and comprehensive planning of the allocation through the ongoing Local Plan Examination process.

END

Contact

Charles Collins MSc MRTPI

Director

Ccollins@savills.com

Hannah Keyte MA MRTPI

Senior Planner

Hannah.keyte@savills.com

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS.

A subsidiary of Savills plc. Registered in England No. 2605138. Registered office: 33 Margaret Street, London, W1G 0JD

The Savills logo, featuring the word "savills" in a lowercase, sans-serif font, with the 's' in a darker shade of red than the rest of the word. The logo is positioned in the bottom right corner of the page, set against a light yellow background.